

## **REMARKS**

Claims 1-13, 15-17 and 20-27 are presently pending in the application. Claims 1-13, 15-17 and 20-27 are rejected. Claims 1, 13 and 21 have been amended.

Reconsideration of the objections and rejections set forth in the aforementioned Office Action is respectfully requested in view of the following remarks. The basis for the amendments can be found throughout the Specification, Claims and Drawings as originally filed.

### **REJECTION UNDER 35 U.S.C. § 103**

Claims 1-11, 13, 15-17 and 20-27 stand rejected under 35 U.S.C. § 103(a) as being unpatentable by EPO 0 110 525 in view of either EPO 0 022 307 or Russia 2018384.

Regarding claims 1-12, the Applicants have amended claim 1 to note that the chamber has a bottom extending beneath the part when the chamber is in the second position. The Applicants respectfully submit that none of the references cited either solely or in combination with one another teach or suggest an industrial parts washer as defined by amended claim 1. In particular, the Applicants would like to point out to the Examiner that cabinet 2 of EPO '525 is not moveable parallel to the ground. Cabinet 2 is not moveable from a first position clear of the part to a second position engaging a stand supporting the part. EPO '525 does not disclose the stand and the chamber forming a sealed volume encapsulating the part when the chamber is in a second position. The Applicants respectfully submit that the claims industrial parts washer is not merely a reversal, duplication or re-arrangement of parts as stated by the Examiner. In particular, the cabinet 2 of the '525 reference also includes other structures such as

manifolds 14, electro valves 15, a conveyor belt arrangement (not identified) and a fluid pumping arrangement (not identified) all having fixed locations attached to cabinet 2. If cabinet 2 were simply made moveable, a great number of other engineering complications may arise. Furthermore, robot 4 was particularly chosen for its ability to move part 3 from transfer station 1 to a location within fixed cabinet 2. If cabinet 2 were moveable, additional components and/or robots would be required to move part 3 from the transfer mechanism 1 to a position to be washed.

While the Examiner states that Russia '384 or EPO '307 may be viewed in combination with EPO '525 to render claim 1 obvious, the Applicants respectfully submit that none of the references cited disclose a moveable chamber having a bottom extending beneath the part when the chamber is in the second position. On the contrary, Russia '384 discloses moveable hoods (8, 9) having no bottom. EPO '307 discloses mobile housings 3 that, even when moved into contact with each other, have an open bottom allowing liquid to be directed downwards and collected in gutter 14 as defined on page 6, lines 12-14.

Furthermore, none of the references cited, either solely or in combination with one another, disclose a moveable chamber engaging the stand supporting the part where the stand and the chamber form a sealed volume encapsulating the part when the chamber is in the second position.

Because claims 2-12 depend on claim 1, the Applicants respectfully request withdrawal of the rejections relating to claims 1-12 based on the amendment to claim 1 and the arguments previously set forth.

The Applicants have amended claim 13 to note that the entire lift assembly is positioned outside of the first chamber when the first chamber is in the second position. The Applicants respectfully submit that none of the references cited, either solely or in combination with one another, teach or suggest an industrial parts washing station as defined by amended claim 13. On the contrary, EPO '525 discloses clamp 5 as being operable to transfer the part and also discloses clamp 5 being positioned within cabinet 2 when spraying occurs. Similarly, EPO '307 discloses bars 1 being exposed to washing solvent during the part cleaning operation. Lastly, Russia '384 does not disclose any elements of the claim relating to the lift assembly, the cantilever mount of the first chamber on a slide, and the relation of the base portion to the first chamber, among others. Accordingly, the Applicants respectfully request withdrawal of the § 103 rejections to claims 13, 15-17 and 20.

Regarding claim 21, the Applicants have amended this claim to note that the horizontally slidable chamber is selectively moveable between a first position clear of the part and a second position where the chamber circumferentially encompasses the part among other limitations found in claim 21. The Applicants respectfully submit that none of the references cited either solely or in combination with one another teach or suggest an industrial parts washer as defined by amended claim 21. On the contrary, Russia '384 discloses hoods (8,9) which may selectively cover the article to be washed but do not circumferentially encompass it. Similarly, EPO '307 discloses moveable housings 3 that only partially cover the workpiece when positioned in contact with one another. However, neither housing 3 nor do both housings 3 circumferentially encompass the part when in a second position. Lastly, cabinet 2 of EPO '525 is not

moveable between a first position clear of the part and a second position circumferentially encompassing the part. Accordingly, the Applicants respectfully the Examiner to withdraw the § 103 rejections to claims 21-27.

**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. The Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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